

## **Portland Harbor Pre-Design Investigation and Baseline Sampling**

### **Summing Rules**

After additional review and discussion with its partners, the EPA has determined that the FS summation rules are the most appropriate methodology for use during remedial design and long-term monitoring. The EPA acknowledges that the pre-design investigation and baseline sampling (PDI/BL) data collected by the Pre-Remedial Design Group in 2018 and 2019 followed a slightly different summation approach. The different approaches for handling non-detected analytes result in a negligible difference in the final calculated summations. However, prior to posting the PDI/BL data to the Portland Harbor interim data portal the EPA has updated the calculated totals in the PDI/BL data to reflect the FS summation rules approach.